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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ROBERT GUY RUSSELL,

14 Defendant.
15

Case No. 2:20-cr-00059-APG-DJA

**STIPULATION TO CONTINUE
SENTENCING**
(Eleventh Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and
19 Brian Pugh, Assistant Federal Public Defender, counsel for Robert Guy Russell, that the
20 Sentencing Hearing currently scheduled on January 12, 2023 at 1:30 p.m., be vacated and
21 continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. In October, the government provided the defense with 4179 pages of discovery.
24 2. In November, the government provided the defense with additional discovery
25 constituting approximately 1000 audio files. The defense needs additional time to review this
26 discovery.

1 3. The defense and the government are attempting to negotiate an agreed upon
2 recommended sentence for this Court. The parties need additional time to pursue such an
3 agreement.

4 4. Defendant is not incarcerated and does not object to a continuance.

5 5. This continuance is not sought for the purposes of delay.

6 5. The parties agree to the continuance.

7 This is the eleventh request for continuance filed herein.

8 DATED this 27th day of December 2022.

9 RENE L. VALLADARES
10 Federal Public Defender

9 JASON M. FRIERSON
10 United States Attorney

11 By /s/ Brian Pugh
12 BRIAN PUGH
13 Assistant Federal Public Defender

11 By /s/ Edward G. Veronda
12 EDWARD G. VERONDA
13 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROBERT GUY RUSSELL,
Defendant.

Case No. 2:20-cr-00059-APG-DJA

ORDER

ROBERT GUY RUSSELL,
Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on January 12, 2023 at the hour of 1:30 p.m., be vacated and continued to March 23, 2023 at the hour of 9:30 a.m. in Courtroom 6C.

DATED this 28th day of December , 2022 .


UNITED STATES DISTRICT JUDGE